REMARKS

Claims 1-26 are pending in the action. Claims 5, 7, 10-12, 17 and 19 have been amended. Claims 9 and 15 have been re-written in independent form. New claims 23-26 have been added.

The Office Action states that claims 5 and 17 have been objected to because of minor informalities. The claims have been amended to replace the word 'claiming' with the word 'clamping'. As such, the Applicant believes that these claims are now allowable.

The Office Action further rejects claims 7, 8, 12-14, 21 and 22 under 35 U.S.C. §112 as being indefinite for failing to particularly point out and distinctly claim the subject matter. Specifically, the Office states that the claims fail to set forth sufficient structure to define how the smoothing device operates. The Applicant respectfully traverses the rejection.

Claims 7, 12 and 21 have been amended to specify that the platform has a hollow frame, "wherein the horizontal bed is sized to pass through the hollow frame when the horizontal bed is elevated". Applicant believes that this sufficiently sets forth structure to define the interaction between the frame, upon which the print substrate is secured, and the horizontal bed of the smoothing device. Applicant believes that these claims are now in allowable form and overcome the rejection under §112. As claims 8, 13-14 and 22 depend from claims 7, 12, and 21, the Applicant believes that these claims are also allowable.

The Office further rejects claims 1-3 pursuant to 35 U.S.C. §103(b) as being anticipated by U.S. Patent No. 5,937,749 to Ford. The Applicant respectfully disagrees and traverses the rejection.

The Ford reference discloses a silk screen printing apparatus having a plurality of printer platforms having a pair of parallel tracks each of which has an appropriately placed rolling chase

registry notches. The plurality of printer platforms are connected such that the tracks 2 form a continuous parallel track across the platforms. A rolling chase having a fabric platform 14 supports the fabric upon which to print. A rotatable screen is positioned above the track on the printer platform such that when the printer platform is positioned in conjunction with the registry notches, the screen can be lowered onto the fabric, such as a T-shirt, residing on the fabric platform 14. During printing, "the screen is pulled down over the rolling chase with its T-shirt on the fabric platform and ink is applied to the screen and squeegeed in place." See col. 5, lines 2-5. Each screen represents a separate color for printing.

In vast contrast, the system disclosed in this application is a system for printing images, such as billboards, on oversized substrates. An oversized substrate, which is comprised of smaller substrates, i.e., print material, is placed on a platform and transmitted to the print head via a track, wherein the image, in its, entirety, is printed by a print head that scans across the substrate. Further, the image to be printed is stored in a computer and is not contained on or in the print head.

The Ford reference fails to anticipate the present invention in that it does not have a "print head [which] is configured to *scan* across the print substrate." Indeed, in Ford, the screen appears to be the print head. The screen however only rotates up and down such that the screen is positioned above the print platform or is placed on top of the fabric platform. The "ink is applied to the screen and squeegeed in place". See col. 5, lines 4-5. There is no movement of the screen by which the ink is applied. Indeed, the screen does not move, and thus, it cannot scan across the print substrate as required by the language of claim 1. In light of the above, Ford does not anticipate claim 1 as Ford does not teach a print head "configured to scan across the print substrate."

With regard to claim 2, the print substrate in the Ford disclosure is the T-shirt or fabric which is secured to the fabric platform. The Office states that "Ford teaches print substrate 25, which can comprise of a plurality of smaller segments being printed upon." The Applicant disagrees and contends that there is no teaching or suggestion that the T-shirt comprises a plurality of smaller substrate segments. Indeed, the T-shirt is merely an example of a fabric to be printed upon and there is no discussion regarding the fabric comprising "a plurality of smaller segments". The Applicant contends it is inappropriate to suggest that because the T-shirt *may* have sleeves which have been sewn on, that this limitation has been met as there is no teaching of this element.

Finally, with regard to claim 3, the Office states that "Ford teaches loading station 14". The Applicant contends that the claims requires an "unloading and delivery station" *and* "a loading station". As these are distinct elements, to teach claim 3, the Ford reference must have both an "unloading and delivery station" and "a loading station". The rejection clearly indicates that these elements are the same, and thus, are not separate and distinct as required by the claim.

In light of the foregoing, the Applicant believes that the Ford reference does not meet claim 1 as it fails to meet the requirement that the print head scan across the print substrate. As such, since Ford fails to meet claim 1, it also fails to anticipate claims 2 and 3 which depend from claim 1.

The Office Action further rejects claims 10 and 11 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,389,476 to Kruchko. The Applicant respectfully disagrees and traverses the rejection.

The Kruchko reference discloses a system for a method of producing life sized decals. In Kruchko, a digitized image 28 is enlarged and processed. The digitized image is devleoped into a

film negative image which is substantially the same size as the original image. Registration marks are added to the film negative image to form registration lines on the negative image for dividing the image. The film negative image is divided into image sections and printed onto a medium. Depending upon the size of the image the image sections can be printed onto a single sheet (Figure 3A) or multiple sheets (Figure 3B), wherein the sheets are printing plates (see col. 4, lines 61- 65).

The method described in Kruchko represents the prior art disclosed in the present invention, wherein image sections are printed on separate single sized sheets or printing plates (see e.g., page 2, lines 5-9). In vast contrast, in the present invention, a single image is printed onto a single print substrate, wherein the single print substrate, not the image, is constructed from smaller *print substrates*. Indeed, Kruchko does not teach or suggest that the printing plates, that is the print substrates, are made from smaller print plates, nor does the undersigned believe that the printing plates could physically be constructed of smaller print plates.

The Applicant believes that the Office is asserting that the print segments are equivalent to the image sections. This is not true. In Kruchko, the image itself is being divided into image sections. Each of these image sections is being printed upon a unitary print plate. The print segments, as set forth in the claims, are the materials upon which the image is printed, wherein the image sections are the segments of the divided image which are being printed. These are physically different.

Claims 10 and 11 have been amended to clarify that the "print segments" are "print substrate segments", that is, segments of the material upon which the image will be printed. In this regard, the Applicant asserts that the Kruchko reference does not anticipate claims 10 or 11. Further, claim 11 requires "coupling an attachment member along at least one side of the single substrate." No

coupling of an attachment member is taught or suggested in the Kruchko reference, and thus, further fails to anticipate claim 11. Indeed, no attachment member is taught in the Kruchko reference.

The Office Action further rejects claims 4-6 pursuant to 35 U.S.C. §103(a) as being unpatentable over Ford in view of U.S. Patent No. 5,887,519 to Zelko. The Applicant respectfully disagrees and traverses the rejection.

The Applicant refers to the arguments set forth above regarding the Ford reference. As the Ford reference fails to meet every element of claim 1, the Ford reference fails to anticipate claim 1. As such, claims 4-6 cannot be rendered obvious and are thus, also allowable.

Finally, the Office rejects claims 19 and 20 pursuant to 35 U.S.C. §103(a) as being unpatentable over Kruchko in view of Ford. The Applicant respectfully disagrees and traverses the rejection.

The Applicant refers to the arguments set forth above regarding the Kruchko reference. Applying the above arguments to claim 19, which is similar to claim 10, illustrates that claim 19 as amended is not anticipated by Kruchko. Thus, claim 20, which depends from 19, is also allowable.

The Examiner has stated that claims 9 and 15 are objected as being dependent upon a rejected claim base, but are allowable if re-written in independent form. The Applicant thanks the Examiner. The Applicant has re-written claims 9 and 15 in independent form and thus, contends that these claims are now in allowable form.

Claims 23-26 have been added. New claim 23 is directed to the movement of the print head. New claim 24 is directed to elevating the horizontal bed and substrate and new claim 25 is directed to the smoothing device. Finally, new claim 26 is directed to assembling the substrate segments into

a single unitary substrate. None of these elements are found in the cited references.

The Applicant believes that the claims are now in condition for allowance. As such, the Applicant respectfully requests that the Office withdraw the rejections and pass the claims onto allowance.

Respectfully submitted,

Dated: August 23, 2003

Anna M. Vradenburgh
Reg. No. 39,868

AMV/
Enclosures: Request for Ext of Time
Check $585.00 (#1324)